
From: Croxton, Dave
To: Henning, Alan; Wu, Jennifer
Sent: 1/6/2015 7:56:45 PM
Subject: RE: Pesticides section in write-up

My edit suggestions are included in Alan's

From: Henning, Alan
Sent: Tuesday, January 06, 2015 3:08 PM
To: Wu, Jennifer; Croxton, Dave
Subject: RE: Pesticides section in write-up

My edits are included.

From: Wu, Jennifer
Sent: Tuesday, January 06, 2015 2:33 PM
To: Croxton, Dave; Henning, Alan
Subject: Pesticides section in write-up

Hi Dave and Alan,

Just FYI, here's the pesticides section. If you both send me your changes before 4pm, I can combine them. I also caught some inconsistencies re: similar language, but will wait until I get both of your comments before I make any changes.

1. Spray Buffers for Aerial Application of Herbicides on Non-Fish Bearing Streams: regulatory and/or voluntary approaches that could be established

- Current Deficiencies/Deficiencies: Oregon does not have a spray buffer to protect small, non-fish bearing streams when herbicides are aerially applied.
- Examples of State Actions Needed: 1) Riparian buffer protections for non-fish bearing streams may also suffice as a protective herbicide spray buffers provided assuming that the riparian buffer protections extend the length of the non-fish bearing stream where spraying occurs; or 2) Adopt rules for aerial herbicide spray buffers for small, non-fish bearing streams; or 3) Voluntary approach that includes guidelines for buffer protections for aerial application of herbicides on non-fish bearing streams; Monitor and track voluntary measures using existing pesticide regulations; Explore-Identify ODF and DEQ general authorities for enforcing changes in critical areas when voluntary measures are not implemented; . For all options include a 4) ~~R~~ revised ODF Notification of Operation form to explicitly include that aerial applicators will adhere to FIFRA labels, especially for herbicides that are prohibited from spraying in/above waterbodies, for all stream types, including non-fish bearing streams. **(All voluntary approaches need monitoring, tracking and identification of enforcement authorities that can be used if voluntary approach fails to achieve the desired results.)**